

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

OPTOTRAFFIC, LLC,)	CASE NO. 1:13-cv-00636
)	
Plaintiff,)	JUDGE DLOTT
)	MAGISTRATE JUDGE BOWMAN
)	
vs.)	
)	
SHERIFF JIM NEIL, in his official capacity)	<u>UNOPPOSED MOTION FOR</u>
as Sheriff of Hamilton County,)	<u>EXTENSION OF TIME</u>
et al.,)	<u>TO FILE OPPOSITION BRIEF/</u>
)	<u>REPLYBRIEF</u>
)	
Defendants.)	

Plaintiff Optotraffic, LLC moves the Court for an extension of time until Monday, November 4, 2013, in which to file a memorandum in opposition to the County Defendants' Motion to Dismiss and an attendant reply brief in support of Optotraffic's Motion for Preliminary Injunction. The County Defendants filed their Motion to Dismiss and brief in opposition to the Motion for Preliminary Injunction on October 16, 2013, and Optotraffic's briefs are due October 30, today. Just this morning, the First District Court of Appeals issued orders concerning the current appeal pending before that court and the Optotraffic equipment at issue. These orders may affect the scope of the issues presented in the pending motions before this Court, and Optotraffic requests leave in order to fully digest the First District orders and revise its motion papers appropriately, if necessary.

Optotraffic has conferred with counsel for the County Defendants, who have no objection to this request.

Respectfully submitted,

/s/John M. Alten

Joseph A. Castrodale (0018494)

John M. Alten (0071580)

Laura C. McBride (0080059)

ULMER & BERNE LLP

1660 West 2nd Street, Suite 1100

Cleveland, Ohio 44113

PH: (614) 583-7000

FAX: (614) 583-7035

jcastrodale@ulmer.com

jalten@ulmer.com

lmcbride@ulmer.com

Christopher R. Heekin (0042032)

HEEKIN & HEEKIN

817 Main Street, Suite 200

Cincinnati, Ohio 45202

PH: (513) 345-5560

FAX: (513) 345-5565

crheelkin@gmail.com

Attorneys for Plaintiff

Optotrafic, LLC

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's Electronic Case Filing System or by regular mail for parties not receiving electronic notices. Parties may access this filing through the Court's Electronic Case Filing System.

/s/John M. Alten

One of the Attorneys for Plaintiff
Optotraffic, LLC